



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

REGIONAL
ADMINISTRATOR'S
DIVISION

October 21, 2021

Alaska Department of Transportation and Public Facilities
Attention: Brian Elliot
P.O. Box 196900
Anchorage, Alaska 99519-6900

Dear Brian Elliot:

The U.S. Environmental Protection Agency has reviewed your September 20, 2021 letter requesting scoping comments on a proposed project to improve the Scammon Bay Airport in Scammon Bay, Alaska (EPA Region 10 Project Number 21-0054-DOT&PF). According to an email dated October 4, 2021 from Bob Effinger of your staff, the Alaska Department of Transportation and Public Facilities will prepare an environmental assessment for the project. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

Your scoping letter indicates the purpose of the project is to enhance safety and improve infrastructure at the Scammon Bay Airport and protect airport infrastructure from ongoing coastal flooding events. EPA understands the proposed project is necessary to minimize the impact of flooding at the airport, which the airport experiences frequently. The Federal Emergency Management Agency declared the airport a disaster area and awarded funds to rehabilitate the airport to pre-disaster conditions, which was completed in 2018. Repeated historical flooding of operational surfaces requires corrective measures to ensure that such weather events do not result in another disaster declaration for the airport.

EPA appreciates the detailed preliminary environmental information provided in the scoping letter. In addition to potentially impacted resources already identified by your agency, we provide the following attached recommendations for your consideration.

Thank you for the opportunity to review the scoping notice for this project. If you have questions about this review, please contact Susan Sturges of my staff at (206) 553-2117 or sturges.susan@epa.gov or me at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief
Policy and Environmental Review Branch

Enclosure

**EPA Scoping Comments on the Proposed
Scammon Bay Airport Improvements
Scammon Bay, Alaska | October 2021**

Aquatic Resources

The provided scoping information indicates the project will likely involve dredge and/or fill into jurisdictional wetlands and other Waters of the U.S, requiring U.S. Army Corps of Engineers authorization. Since the project will likely result in aquatic resources impacts, EPA recommends including the following in the EA:

- Description of all Waters of the U.S., including wetlands, that the project could affect and an assessment of direct and indirect impacts to those waters;
- Maps showing waterbody locations and resources the project will likely impact;
- Acreages and channel lengths, habitat types, values, and functions of these waters;
- The most current information regarding the status of the Clean Water Act (CWA) Section 401 certification and Section 404 permit application processes, as well as conditions to protect water quality and wetlands;
- Mitigation plans, including compensatory mitigation required under the CWA, to reduce impacts to surface Waters of the U.S.;
- Up-to-date information on the Alaska Pollutant Discharge Elimination System permit application process, including measures to protect water quality and minimize impacts. Describe development of a Storm Water Pollution Prevention Plan, which should include elements such as reporting, monitoring, best management practices, erosion and sediment control, and other mitigation measures; and
- Floodplain impacts and steps to reduce floodplain impacts and risks. Activities affecting floodplains are subject to Executive Order 11988: Floodplain Management and Executive Order 13690: Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input.

Construction-related Emissions

EPA acknowledges the project is not within an air quality non-attainment or maintenance area for the National Ambient Air Quality Standards. To address potential construction-related air quality impacts, EPA recommends the EA include a discussion of construction-related air pollutants and potential exposure of these pollutants to nearby populations and sensitive receptors, such as schools. EPA recommends including a discussion of measures to minimize air quality impacts on the local environment and decrease exposure of construction-related emissions and dust to nearby communities and sensitive receptors.

Cumulative Effects

Please note that according to the Federal NEPA Contacts Meeting held on March 25, 2021, the 2020 CEQ regulations do not prevent or prohibit the analysis of cumulative effects. As such, EPA encourages analyzing the project's cumulative effects to best capture impacts to human health and the environment. As you technically assess those effects for the planned NEPA analysis, you may find documents on cumulative impacts assessment helpful as a reference framework, such as EPA's guidance for

*Consideration of Cumulative Impacts in EPA Review of NEPA Documents.*¹ EPA recommends the EA include an assessment of the cumulative impacts associated with the proposed action, specifically, five key areas:

- Resources, if any, that are being cumulatively impacted;
- Appropriate geographic area and the time over which the effects have occurred and will occur;
- All past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
- A benchmark or baseline of existing environmental conditions; and
- Scientifically defensible threshold levels.

Climate Change, Resilience, and Adaptation

EPA recommends that the EA include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area. This could help inform the development of measures to improve the resilience of the project. If projected changes could notably exacerbate the environmental impacts of the project, EPA recommends you also consider these impacts as part of the NEPA analysis.

Consultation and Coordination with Tribal Governments

EPA recommends the EA describe the process and outcome(s) of any government-to-government consultation with Alaska Native Tribal governments that the project may affect, such as the Scammon Bay Native Village; issues that are raised, if any; and how those issues are addressed.

Environmental Justice and Public Participation

Because the project is in proximity to a community with potential for environmental justice concerns, EPA recommends that the EA address the potential for disproportionate adverse impacts to the community. One tool available to locate communities with environmental justice characteristics is EPA's Environmental Justice Screening and Mapping Tool or EJSCREEN². Although EJSCREEN is a valuable tool, it does not currently capture certain demographic characteristics of rural Alaskan communities, such as their remote nature and the high-cost burden of transportation, that may present environmental justice concerns. As such, EPA recommends that the EA consider the definition of "disadvantaged community" as referenced in Executive Order 14008 and further described in the Interim Implementation Guidance for the Justice40 initiative³, which direct agencies to consider a range of specific demographic and environmental variables when assessing a community.

Please also note that if the proposed project will use pesticides and herbicides during implementation, then we recommend that the EA address any potential toxic hazards related to the application of the chemicals and describe what actions to take to ensure that impacts by toxic substances released to the environment are minimized. It is important to recognize the potential impacts to subsistence communities through potential exposure pathways such as game meat processing, surface water contact during fishing, and sediment disturbance from food gathering.

¹ <https://www.epa.gov/sites/production/files/2014-08/documents/cumulative.pdf>

² <https://www.epa.gov/ejscreen>

³ <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>